

# Modern Slavery Statement 2021



# We are St Barbara

A growing gold company with a global outlook. We're here to create value in everything we do for our people, our communities and our shareholders.

As we strive towards our vision to be a brilliant, global mining company that grows sustainably and creates enduring, positive impacts, we are guided every day by our five commitments and values-led culture. At St Barbara, doing the right thing genuinely matters to all of us.

## Our commitments



**Safety Always**



**Empowered People, Diverse Teams**



**Stronger Communities**



**Respecting the Environment**



**Growing Sustainably**

## Our values

Our values guide us in our decision-making every day.

We act with honesty and integrity

We treat people with respect

We value working together

We deliver to promise

We strive to do better

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We at St Barbara acknowledge the First Nations' people of the ancestral lands on which we operate in Australia, Canada and Papua New Guinea. We pay our respects to all First Nation people, and to Elders past, present, and emerging. We recognise the unique cultural heritage, beliefs and connection to these lands, waters and communities held by First Nations' people. We also recognise the importance of the continued protection and preservation of cultural, spiritual and educational practices.

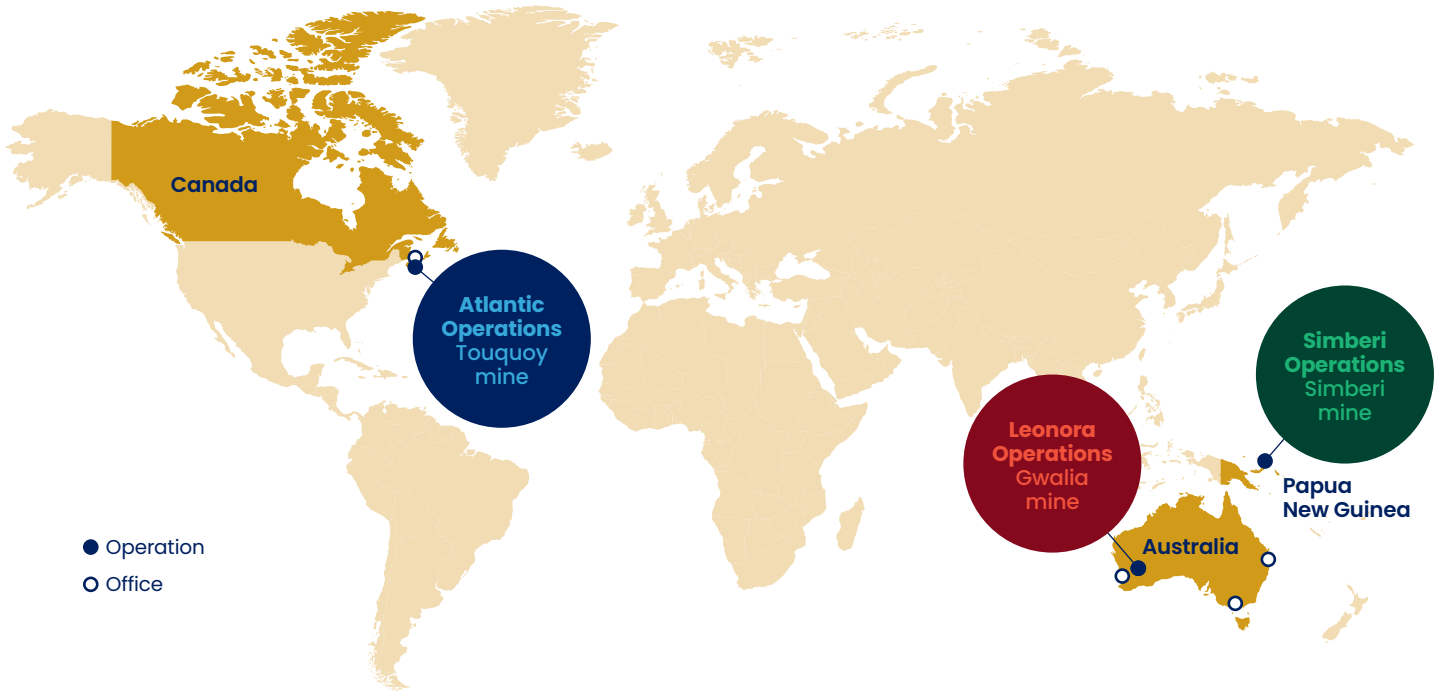
St Barbara Limited ABN 36 009 165 066

Building Brilliance®, Brilliance matters®, and  are registered trademarks of St Barbara Limited and/or its affiliates.

## Our company

We are an Australian based, ASX 200 company with gold mining operations in Australia, Canada and Papua New Guinea. Our assets include our Leonora Operations in Western Australia, our Atlantic Operations in Nova Scotia, Canada and our Simberi Operations in New Ireland Province, Papua New Guinea.

### Our assets



Leonora survey team

# Introduction

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This Modern Slavery Statement (Statement) is made pursuant to the *Modern Slavery Act 2018* (Cth) by St Barbara Limited, for the financial year ended 30 June 2021 (FY21).



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The Board and Management of St Barbara are committed to maintaining high standards of ethics, integrity and statutory compliance.

We are dedicated to continually improving our processes and practices year-on-year to support the elimination of modern slavery within our global operations and supply chains. We recognise that slavery, in its many forms, continues to permeate the supply chains of global entities. We encourage everyone to speak up and play their role in combatting modern slavery. As a gold mining group, we have developed processes and procedures to better understand our areas of risk and influence so as to address, mitigate and remediate instances of modern slavery.

Our five Company values sit at the heart of our approach to addressing modern slavery risks. These values ensure we act with honesty and integrity, treat people with respect, work together, deliver on our promises and strive to do better.

We also have a set of Company commitments. Our strong, values-led culture drives our behaviour and guides our decision-making every day as we deliver to promise on our commitments.

During the FY21 reporting period we made good progress on our Modern Slavery journey. We developed and implemented a Modern Slavery Procedure, held modern slavery and risk workshops, provided training, and established a Modern Slavery Working Group as part of our overarching governance framework.

To strengthen our practices, we engaged with local external stakeholders to share learnings and identify areas for future collaboration.

We are committed to partnering with suppliers whose principles match our own. Across our business, we have established due diligence systems to identify and investigate any high-risk suppliers.

In FY21 we assessed our Modern Slavery risks, with a focus on our Simberi Operations, located in Papua New Guinea (PNG), and developed a communications plan and materials to support awareness in the workforce. We commenced a deep dive into the construction supply chain in PNG and implemented a Modern Slavery questionnaire for contracting companies that source workers on Simberi Island for St Barbara.

Our focus continues to be on protecting and enhancing the safety, health and wellbeing of our employees, their families, our business partners and our communities during the COVID-19 pandemic - and beyond.

This statement has been approved by St Barbara Limited's Board of Directors on 7 December 2021.

A handwritten signature in black ink, appearing to read 'C. Jetson'.

**Craig Jetson**  
Managing Director and CEO

7 December 2021

# Our structure, operations and supply chains

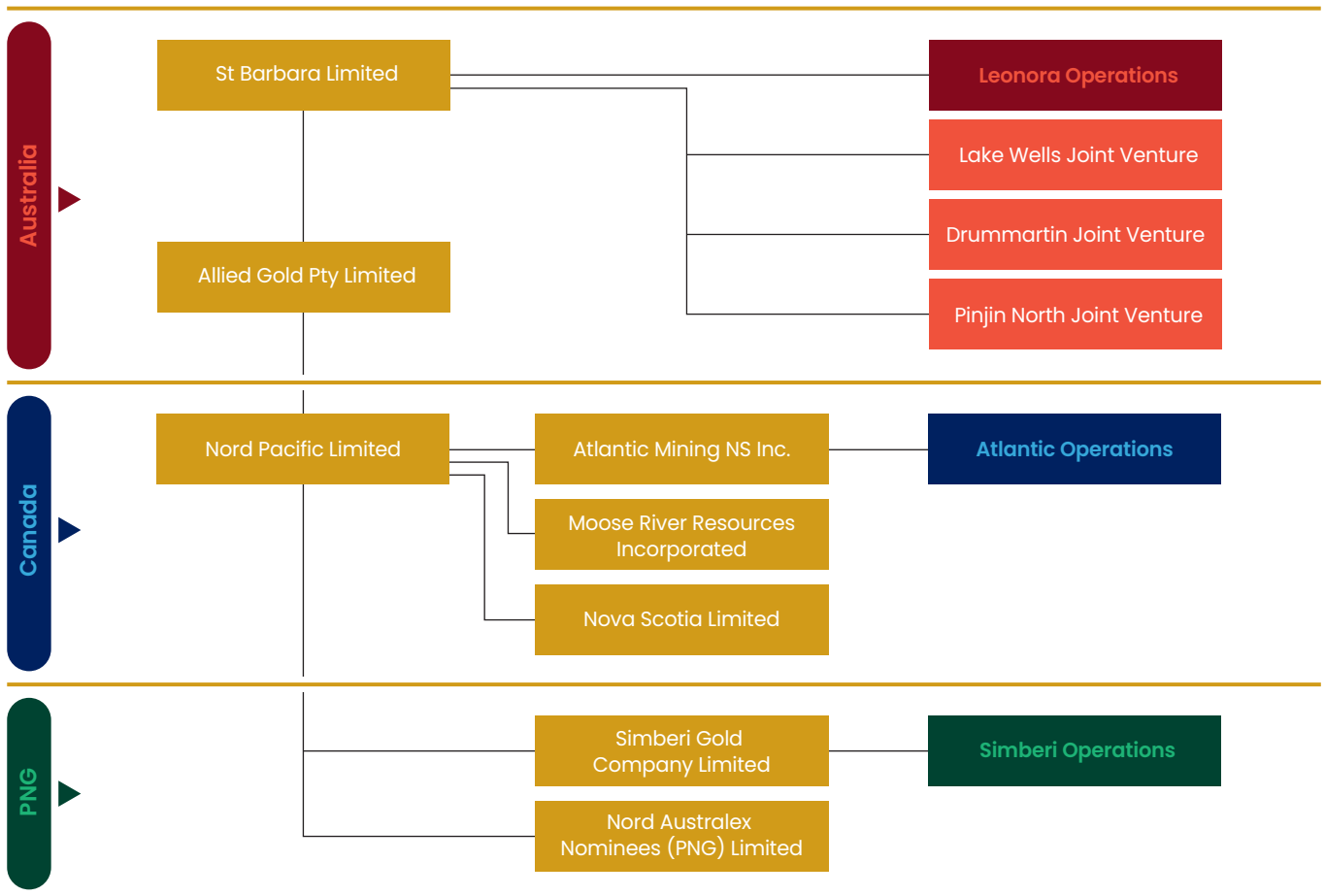
St Barbara is a growing gold company with a global outlook. We have gold mining operations located in Australia, Canada and Papua New Guinea. The St Barbara group comprises eight corporate entities with over 1,300 employees.

## Our structure

St Barbara Limited (ACN 009 165 066) is a publicly listed company on the Australian Securities Exchange (**ASX**) and is headquartered in Melbourne, Victoria with an office in Perth, Western Australia and a warehouse in Lytton, Queensland.

As illustrated in the diagram below, as at 30 June 2021, St Barbara Limited was the ultimate holding company of the following wholly-owned subsidiaries across Australia, Canada and Papua New Guinea:

- Allied Gold Pty Limited, non-operating company registered in Australia.
- Atlantic Mining NS Inc. (trading as Atlantic Operations), operating company registered in Nova Scotia, Canada.
- Nord Australex Nominees (PNG) Limited, non-operating company registered in Papua New Guinea.
- Nord Pacific Limited, non-operating company registered in New Brunswick, Canada.
- Simberi Gold Company Limited, operating company registered in Papua New Guinea.
- Moose River Resources Incorporated, non-operating company registered in Nova Scotia Canada.
- Nova Scotia Limited, non-operating company registered in Nova Scotia Canada.



### Our operations

St Barbara's operations include three operating gold mines, exploration activities, rights to acquire interests in operated and non-operated joint ventures, and equity investments. In FY21 we also toll processed third party ore at our Leonora operations.

We own and operate the following three gold mining operations:

- Atlantic Operations, which includes the Touquoy open pit mine and three additional planned pits nearby at Beaver Dam, Cochrane Hill and Fifteen Mile Stream. These operations are located approximately 80km north east of Halifax, Nova Scotia in Canada.
- Leonora Operations, which includes the Gwalia 1.2 Mtpa processing plant and the Gwalia underground mine. The Gwalia underground mine is located 235km from Kalgoorlie, Western Australia.
- Simberi Operations, which is an open cut mine situated on the northernmost island in the Tabar group of islands in the Province of New Ireland – the eastern most Province of PNG and approximately 1,000km north of Port Moresby.

We also conduct exploration activities globally, with exploration teams based at the Gwalia mine (Western Australia), Touquoy mine (Canada), Simberi mine (PNG) and Perth for regional projects in Australia. These regional projects include Pinjin and Lake Wells (Western Australia), Back Creek (New South Wales), and Drummartin (Victoria).

Our operated and non-operated exploration joint ventures are:

- **Drummartin Joint Venture** – St Barbara entered into an Earn-in and Joint Venture Agreement with Catalyst Metals Limited and Kite Operations Pty Ltd dated 23 November 2019 in respect of the Drummartin Project located approximately 60km north of the Fosterville Gold Mine in Fosterville, Victoria. Under this agreement, we have a right to acquire a 50% participating interest. As at 30 June 2021, we have not exercised our right to acquire our participating interest and do not have operational control of this joint venture. St Barbara has been appointed as manager of this joint venture during the earn-in period.
- **Horn Island Joint Venture** – St Barbara entered into an Earn-in and Joint Venture Agreement with Alice Queen Limited and Kauraru Gold Pty Ltd on 4 June 2019 in respect of the Horn Island Project located on Horn Island in far-north Queensland. Under this agreement, we had the right to acquire a 70% participating interest. We withdrew from the Horn Island Joint Venture in May 2021.
- **Lake Wells Joint Venture** – St Barbara entered into an Earn-in and Joint Venture Agreement with Australian Potash Limited on 7 October 2018 in respect of the Lake Wells Project located approximately 150km north-east of Laverton, Western Australia. We have operational control of this joint venture. Under this agreement, we have a right to acquire a 70% participating interest. St Barbara has been appointed as manager of this joint venture during the earn-in period. In March 2021 we exercised our right to acquire its full participating interest, which is yet to be finalised as at the date of this statement.
- **Pinjin North Joint Venture** – St Barbara entered into a Farm-in and Joint Venture Agreement with Stakewell Pty Ltd and Ironside Pty Ltd on 23 March 2021 in respect of the Pinjin North Project, in Western Australia. Under this agreement, Stakewell Pty Ltd will have the right to acquire up to a 80% participating interest. We do not manage nor have operational control of this joint venture. As at 30 June 2021, Stakewell Pty Ltd has not exercised its right to acquire a participating interest.

In FY21 St Barbara had minority equity investments in the following companies listed on the ASX:

- Catalyst Metals Limited (CYL)
- Duketon Mining Limited<sup>1</sup> (DKM)
- Peel Mining Limited (PEX)

### Snapshot of our workforce

As at 30 June 2021, our workforce comprised of 1,313 employees as well as supporting contractor personnel. The employee and contractor breakdown for each country that we operate in is as follows:

Employee and contractor numbers		FY21
Australia	Employees	164 (Leonora) 63 (Corporate)
	Contractors	449
	Total	699
Canada	Employees	333
	Contractors	6
	Total	327
Papua New Guinea	Employees	753
	Contractors	467
	Total	1,234
Total	Employees	1,337
	Contractors	921
	Total	2,259

Proportion of women employed	FY21
Australia	28%
Canada	23%
Papua New Guinea	16%
Women in management	24%
Women in entire workforce	20%

At our Atlantic Operations, over 91% of our employees are from the local area. We employ over 300 personnel on Nova Scotia's Eastern Shore.

At Leonora Operations 3% of our current employee base is from the local area. The small local community has relatively few people in the highly skilled categories typically required for underground mining. In Western Australia 'FIFO' (fly-in, fly-out) labour is the prevalent employment mode in the resources industry.

Our employees in Canada and Australia perform a range of roles from mining engineers, geologists, technicians, plant operators, truck drivers, accountants, administrators and other professionals.

Our Simberi Operations has a significant PNG national workforce with 44% of the local workforce based on the island of Simberi and surrounding local Tabar islands, as well as a further 53% being other PNG nationals. Local employees are represented in all areas of the operation with the majority in roles such as heavy vehicle operators, camp and kitchen support and administration.

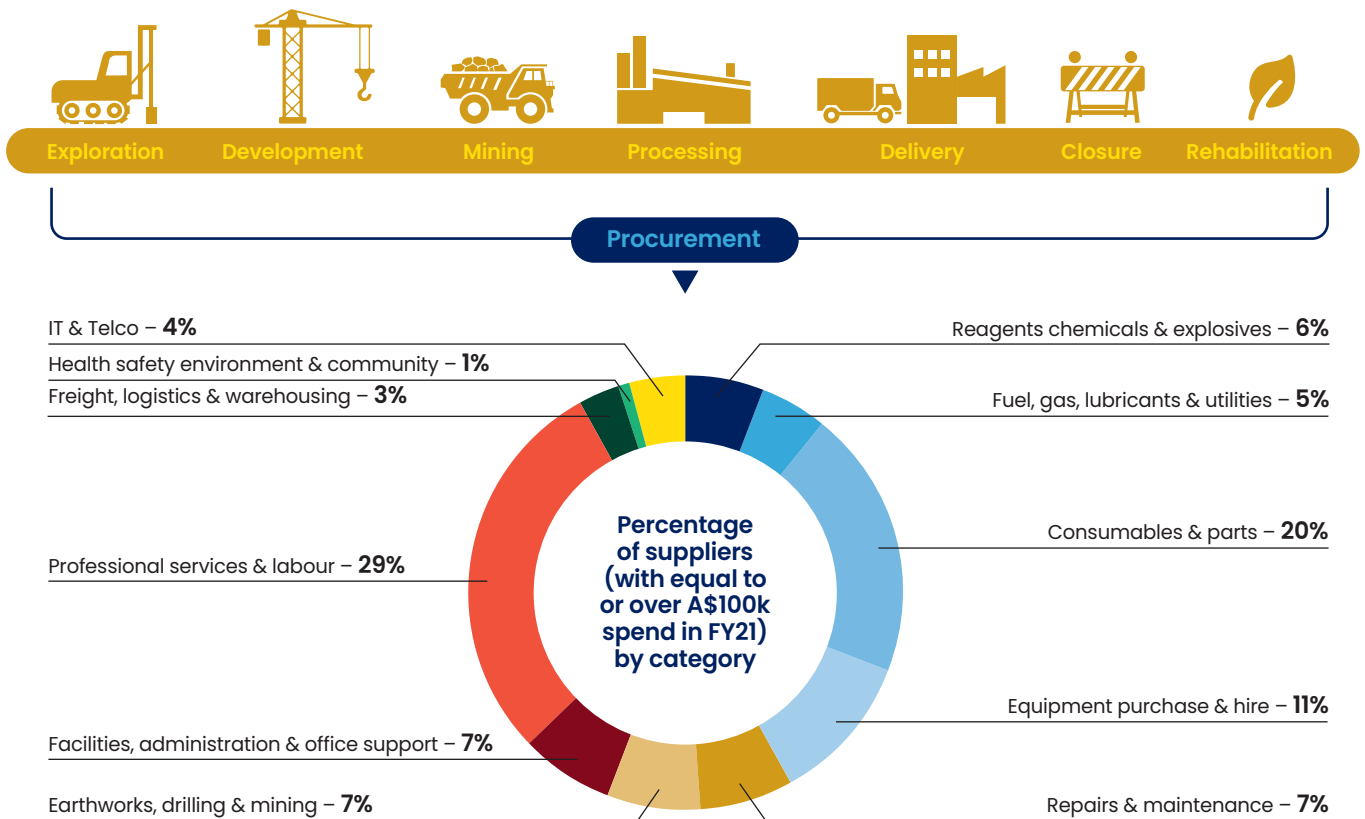
1. Sold in July 2021

**Our supply chains**

Our value chain and supply chain process is broadly described as follows: exploration, development, mining, processing, delivery to the mint and closure and rehabilitation.

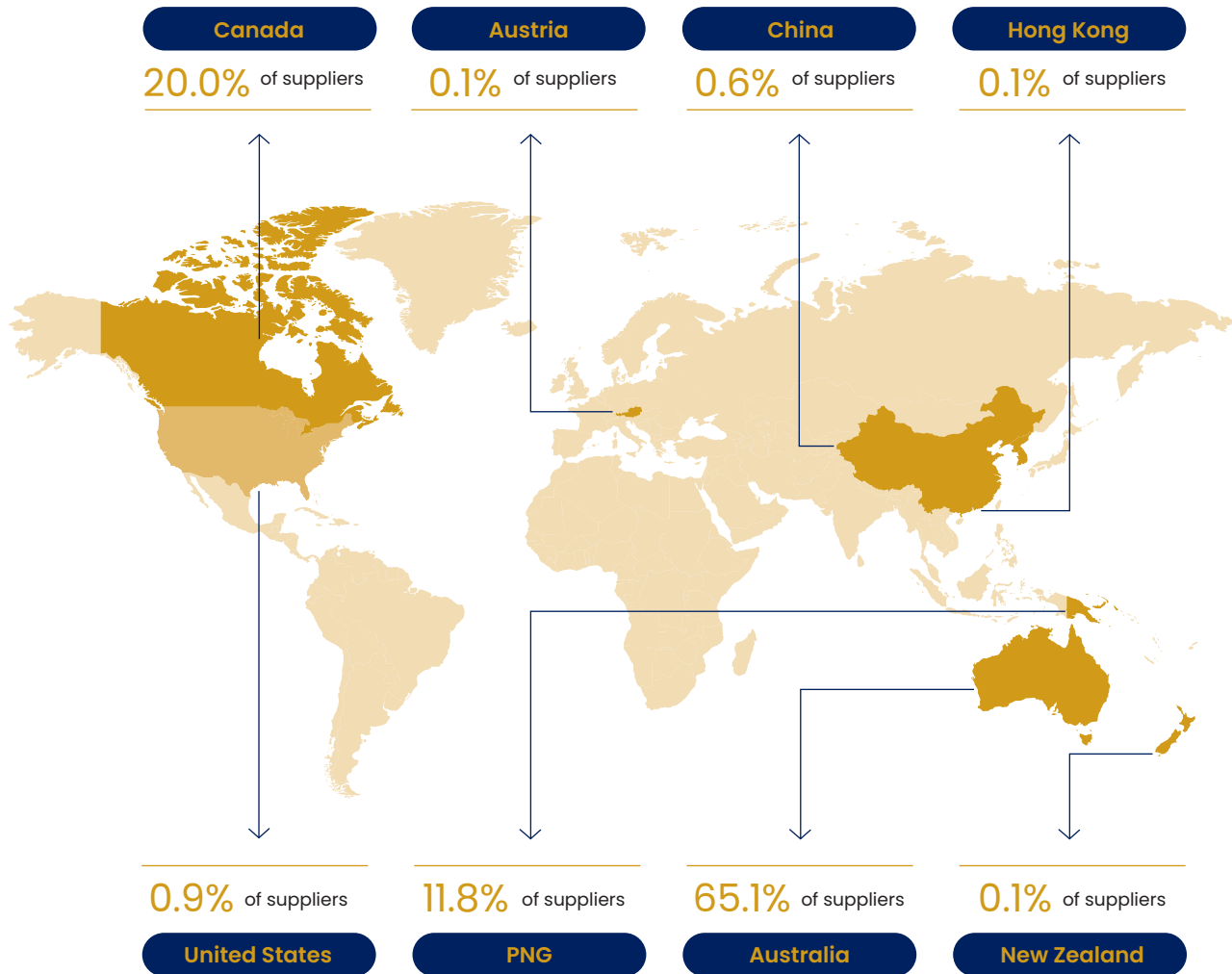
Our procurement function is responsible for providing support to our business to fulfil its operational requirements by employing effective procurement practices resulting in securing goods and services for our business, while providing commercial governance and management of our supply chain risks and opportunities.

A breakdown of our global FY21 material procurement supplier engagements, based on category, is set out in the diagram below:



## Our structure, operations and supply chains continued

Our suppliers provide goods and services from around the globe. The results of our supplier questionnaire (discussed in further detail in this Statement), which was issued to approximately 660 of our suppliers, representing approximately 78% of our overall spend, showed suppliers were domiciled predominately in Australia, PNG and Canada, reflecting the utilisation of local suppliers at our sites wherever possible. This is depicted in the following infographic of the St Barbara Group suppliers that were issued a supplier questionnaire for FY21:



We recognise that a number of our suppliers supply goods that are either grown or manufactured in locations other than where those suppliers are domiciled. These countries include China, Germany, Italy, Japan and the United States. Our focus has remained in this reporting period on our first-tier suppliers. However, going forward, we endeavour to build our capability to analyse the second tier of our supply chain.



# Impact of COVID-19

## COVID-19 management

Since the World Health Organisation identified COVID-19 as a pandemic in March 2020, we have focused on ensuring the safety, health and wellbeing of our employees and their families, business partners and communities throughout this extended global crisis. The Board and executive leadership team continue to acknowledge the extraordinary effort demonstrated by our people and our business partners in keeping each other safe whilst maintaining operations.

Under our Health and Safety Policy and related policies and standards – particularly the Critical Risk Control Standard – Infectious Diseases – we implemented the COVID-19 Management Framework. Through this set of protocols and guidance, we have managed the health and safety aspects of the COVID-19 pandemic effectively.

In March 2021, due to the worsening COVID-19 conditions in PNG, and a small number of COVID-19 cases being identified and contained within our on-site quarantine program, we activated additional controls at our Simberi Operations under the COVID-19 Management Plan.

These additional controls were introduced as a safeguard for our people and the community, with operations continuing. This included limiting the movement of personnel to and from site, and the community. These containment measures and controls are designed to support safe operations, in line with our commitment to Safety Always.

An important part of our management plan is working with local authorities to ensure controls are in place to protect the surrounding community and safeguard the continuity of essential services and supplies.

Our COVID-19 protocols continue to be successful in the early identification of cases, with on-site isolation, quarantine procedures, contact tracing and regular testing – for employees and the community – all proving to be effective. At Simberi, we continue to offer a comprehensive vaccination program through our medical clinic for our employees and the local community.

While localised lockdowns have occurred in both Nova Scotia, Canada, and Australia, our Atlantic and Leonora Operations have not been directly affected, although domestic border closures have impacted the mobility of personnel. St Barbara did not reduce its workforce during the 2021 financial year as a result of COVID-19, and has not sought any COVID-19 related government direct financial assistance, such as the Australian Government JobKeeper scheme.

Some of our FIFO workers on Simberi were unable to return home during their rostered time off due to travel restrictions related to the pandemic. We recognise that this impacted on the freedom of movement of those workers.

We have included a detailed overview of the measures we adopted as part of our response to the pandemic to convey the importance that we place on the wellbeing of the local communities in which we operate.

## Safety of our communities

The COVID-19 pandemic has introduced challenges around conducting in-person audits and other site activities associated with assessment of modern slavery risk. We have, however, been able to contribute to the safety, health and wellbeing of our communities throughout this extended global crisis. While some of the initiatives put in place at the beginning of the pandemic remain relevant, others have shifted and evolved with the changing needs in each locality.

A key priority in our management of COVID-19 is to ensure St Barbara's employees and contractors do not introduce the virus into the community. Our COVID-19 Management Framework and protocols form the basis for our successful management of that risk. We also contributed to and initiated various measures to support our local and wider communities to cope with the medical, isolation-related, and economic impacts of COVID-19. Some of these initiatives are described briefly in the following sections. Activities such as community outreach, volunteering and other programs undertaken by the Group were suspended, delayed, or redirected due to COVID-19 restrictions.

### Atlantic

Like other provinces and countries, Nova Scotia was impacted by COVID-19 and the effects continued across FY21. The Atlantic Operations team continued to prioritise the safety of both the worksite and the local communities by:

- Limiting movement across the province by mandating that all personnel who were not required to be on site worked from home.
- Providing support for local rural organisations and businesses in a range of ways, including food and monetary donations to Food Banks in the area.
- Supporting nursing homes, especially those affected by the pandemic, helping control outbreaks and support with lack of family contact. Atlantic Operations provided homes with iPads for video calls, and when restrictions allowed for outdoor visits, we supplied the nursing home closest to Touquoy with heated tents for outside visits.
- Educating staff on COVID-19 to ensure that our team members were active participants in keeping the community safe. Through the pandemic we shared information on restrictions, vaccinations, and testing. During the second wave in January 2020, an Atlantic Operations team member took part in a video for staff sharing his experience of contracting COVID-19.
- Keeping the community updated by way of electronic channels, including through initiatives such as hosting an online Information Session for our Touquoy Environmental Assessment Project Update, where community members could attend online to hear from experts and ask questions on the project.

### Leonora

During FY21 our Leonora Operations continued to successfully manage the risk of COVID-19 to the workforce and in our interface with the local community. Despite restrictions being applied, the site team maintained awareness of local implications of the pandemic, to support community needs. During FY21, COVID-19 restrictions postponed some planned community engagement activities and regularly supported events in the Leonora region.

### Simberi

Throughout FY21, we had a strong focus around infection prevention, hygiene education, and management of movement between islands to limit transmission.

Initiatives included:

- Assisting Islanders with monitoring boats moving between other islands, with employees and contractors contributing to completing COVID-19 questionnaires and temperature taking.
- Establishing a Simberi Community COVID-19 Committee (SCCC).
- Testing community members.
- Donating test kits to provincial health authorities.
- Donation of 1,500 face masks to schools, health staff and SCCC members and their families.
- Providing COVID-19 and hygiene and health guidance and awareness sessions in all communities.
- Providing handwashing facilities for the local school.
- Providing electric sewing machines to the Simberi Women in Mining association to support mask production.

In early 2021, PNG experienced a second wave of COVID-19, affecting both community members and Simberi personnel. The focus of the community team quickly shifted to ensuring quarantine measures were in place to limit the spread of the virus. The Community Relations team maintained communication with the community to ensure locals were informed of changing circumstances and lockdown requirements. Initiatives during this time included:

- Comprehensive testing.
- Communicating with community leaders to ensure clarity of information.
- Ensuring that school children had access to learning materials during school closure.
- Replacing two deteriorated health centre staff houses.
- Establishing a COVID-19 isolation tent.
- Facilitating a New Ireland Provincial Health Authority (NIPHA) surveillance team to assist community surveillance.
- Weekly SCCC meetings for COVID-19 updates.

Our Australian offices were also able to again contribute with small but meaningful gestures, pooling donations to create care packages of treats and activities for those in quarantine on the island.

Phone counselling and mental health support were sourced through both Australian and Papua New Guinean providers to ensure that those in quarantine had access to appropriate support.

Further information regarding how we are addressing COVID-19 related issues is set out in our FY21 Sustainability Report.



Simberi processing plant

# Risks of modern slavery

While St Barbara is not aware of any modern slavery in its operations and supply chains, we recognise the risk and we are committed to improving in how we manage it.

## Introduction

Consistent with the UN Guiding Principles on Business and Human Rights, we assess the risk of modern slavery practices in our operations and supply chains by determining whether we have caused, contributed to or are directly linked to modern slavery. By way of brief explanation:

Caused	Contribute	Directly Linked
A company may <b>cause</b> modern slavery if its operations directly result in modern slavery practices.	A company may <b>contribute to</b> modern slavery if, through its actions or omissions, it facilitates or incentivises modern slavery practises.	A company may be <b>directly linked to</b> modern slavery practises through the activities of another entity that it has a business relationship with, such as a supplier of joint venture partner.
Example: This may include using forced or exploited labour at one of our sites.	Example: This may include setting unrealistic cost restraints on a service provider that can only be met by that service provider using forced or exploited labour.	Example: This may include engaging a supplier that uses forced labour as part of its own supply chain or manufacturing process.

## Our operations

This section addresses the risks of modern slavery practices in our operations and the location specific processes in place to identify those risks.

We consider that our operational modern slavery risk remains low in respect of our Australian and Canadian operations. Australia and Canada are ranked 163 and 166 respectively out of 167 countries for modern slavery prevalence by the Global Slavery Index. As a result of the low jurisdictional risk, together with the recruitment controls and remuneration programs we have in place, we deem the overall risk of modern slavery practices in our Australian and Canadian operations to be low.

The risk of causing, contributing or being directly linked to modern slavery is inherently higher in our Simberi Operations due to the combination of the country risk profile and the risk profile attributed to the mining sector generally.

For these reasons, in FY21 we remained focused on monitoring the modern slavery risk arising from our operation in Papua New Guinea.

### Simberi – Risk factors detail

- Local workers and our PNG supply chains are determined to be our greatest exposure to modern slavery risks. PNG has a large proportion of the population living below the recognised poverty line. This is especially the case in regional isolated locations. However, labour conditions are often regulated by local customary systems – such as tribal and clan type organisations of mutual aid and reciprocity – making modern slavery (versus simple poverty) less likely. Mines are typically supported by local communities due to the wealth and infrastructure they bring to the locality.
- Our 2009 benchmark study at Simberi (when mining had only just commenced) indicated the per household annual income was less than Kina 1,000 (US\$284). In 2017 average household income had increased to over Kina 4,000 (US\$1,200). We provide medical health care and basic infrastructure (roads, airport and wharf facilities) and contribute to education, other infrastructure (erosion control, water and sanitation) and law and order services.

- Mechanised mining operations typically employ “in demand” highly skilled staff, making modern slavery type conditions less likely. Approximately 35% of the workforce at Simberi is “in demand” high skilled or management employees from other parts of PNG. Different to local employees and contractors, there is strong competition for these services from other mines and the Oil and Gas industry. This group is typically well paid as compared to local standards, flown to site and home on short rosters (approximately two weeks on, one week off), and housed in an accommodation camp. This roster is currently extended due to the quarantine requirements imposed by both the PNG and Australian governments on domestic and international arrivals during FY21.
- The work performed by the remaining 65% of the roles include heavy vehicle operators, process laborers, vegetation clearance, cleaners and cooks.
- A key cause of large-scale immigration and a recognised modern slavery risk is artisanal mining. The Simberi gold ore type is not amenable to artisanal mining, reducing the attraction ‘pull’ to immigrants.
- The lack of artisanal mining at Simberi is a key mitigating factor with respect to the reduced risk of modern slavery practices at our PNG operations.
- Living costs, including food costs, can increase in the locality of mines, often because the local area can no longer support the increased population or local farmers have become mine workers. There is some evidence this is the case at Simberi. A survey conducted for the 2019 Social Impact Study provided strong evidence that the population is reliant on imported foodstuffs. The importing companies are largely controlled by immigrants. Foodstuffs are typically sold at a premium compared to other parts of PNG due to the isolation of Simberi and the scarcity of capital and networks for local business to set-up in competition with immigrants. COVID-19 has been a strong stressor on food importation, with the Company necessarily taking over this role at times, by on-selling food at cost to local suppliers.

### Child labour

- We recognise from the ILO's publication, *Child Labour In Mining And Global Supply Chains 2019*, that the mining sector can potentially cause child labour. However, we consider the risk is lower at Simberi, being a mechanised western style mine with an ore deposit that does not support artisanal mining. The ILO notes that 'child labour in mining is most commonly found in artisanal and small-scale mines'<sup>1</sup>.
- Verifying the age of locals on Simberi Island remains challenging due to the fact that birth certificates are extremely uncommon. National ID Cards (**NID**) are challenging for locals to obtain, and the majority of locals do not have drivers licences as they do not have vehicles. Some have school certificates which can provide some indication as to the age of the individual, however, the certificates are not considered reliable in terms of validating age.
- National FIFO employees from other parts of PNG are most likely to have a birth certificate, NID, passport (in some cases) or high school completion certificates. The application process is long and requires the applicant to leave site. COVID-19 limited movement off the Island during FY21. It should be noted that high school completion certificates may not be indicative of age as the years of schooling may be protracted depending on individual circumstances.
- Further, there is also limited local awareness of the Lukautim Pikinini (Child) Act 2009 (No. 7 of 2009). The objective of this Act is to protect and promote the rights and wellbeing of all children regardless of gender and to protect children from all forms of violence, abuse, neglect, exploitation and discrimination, with a clear focus on services for prevention and strengthening family.
- In the absence of age verifying documentation, the contracting companies on Simberi Island that source workers for our Simberi Operations utilise visual checks to confirm working age. The workers sourced via these contracting companies are then required to undergo our own checks, as explained below.
- Similarly, St Barbara's onsite Human Resources team use visual checks at the point when employee ID photos are taken for employees and contractors. Employees are required to complete the new starter form which requires a date of birth. We cross-check this information against the visual checks as a means of verifying age. Some locals have provided us with their "Clinic Book" which is the book mothers are given when children are born on the island. We are exploring this as an option for age verification as part of our action plan to address risks.
- Based on our records, which were reviewed in FY21, there is no one working on our mine site on Simberi Island under the age of 18 years. We remain vigilant about the risk of child labour and other forms of modern slavery that may form part of our Simberi operations. In our ongoing efforts to improve on our ability to detect red flags, Simberi engaged with the Papua New Guinea Human Resources network to share learnings with industry peers and determine whether any new methods were being used to support age verification.

### Wages

- In recognition of the fundamental human right to an adequate living wage, we assessed the wages paid to workers on Simberi Island and focused on the wages paid to the worker categories that were the lowest paid. We identified that assistants in our camps that undertake general cleaning duties in the mess and accommodation rooms and entry level roles in Geology and Environment are the lowest paid workers.
- There is no set living wage in PNG. The only form of set wage is the national minimum wage, which was created by the Minimum Wages Board of Papua New Guinea in 2014 which is yet to be updated.
- There has been no change to the national minimum wage in PNG c K3.50 per hour. From our review, the:
  - lowest hourly rate that we have paid for those with no relevant experience continues to be K3.60 per hour; and
  - lowest annualised salary remains at K11,500 per annum plus superannuation for entry level positions and some assistant roles in Geology and Environment.
- In December 2020, guided by our Competency and Remuneration Framework, we promoted 103 employees (14.7% of the workforce) to a higher salary band in recognition of their increased skills through training and development whilst working at Simberi.
- We continue to participate annually in the Korn Ferry Salary Survey in March together with nine other mining companies in PNG. Simberi Gold Company Limited has participated in this survey for over seven years. Each role at our Simberi operations has a job level and we provide all employee salaries at each job level and in each specialist area (e.g. Maintenance, Human Resources, Finance etc.). This results in average data of the nine companies for low, average and high remuneration bands for each job level. Once this data is released, we update our remuneration benchmarking document which we use for all promotions, appointments of new employees, and through the salary increase and progression processes. This ensures fair, transparent and current remunerations based on experience and qualifications for a role.
- In light of the above, we are satisfied that our workers on Simberi Island are paid in excess of the national minimum wage for PNG and are thus afforded an adequate living wage.

### Living and working conditions

- We acknowledge that everyone has a right to an adequate standard of living, including food and water as well as the right to safe and healthy working conditions. Inadequate living and working conditions can be a potential indicator of modern slavery.
- We provide camp accommodation, three daily meals, drinking water and amenities on Simberi Island for use by those workers that fly into the island from other provinces of PNG for the purposes of work. This accommodation varies from single rooms with ensuite for more senior staff (Superintendent and above), to share rooms (with up to three employees in a room). The camp is maintained and cleaned daily by maintenance and cleaning personnel who are our direct employees.
- Local employees on the mine site are provided with one meal per day and in most situations have supervised break periods.
- All of our employees and contractors working on site receive appropriate Personal Protective Equipment including shirts, pants, work boots, hardhats and glasses, if required.

1. [https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms\\_720743.pdf](https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms_720743.pdf)

## Risks of modern slavery *continued*

St Barbara plays a significant role in improving the living standards year-on-year for the locals living and working on Simberi Island. We conduct many civil-type functions, providing infrastructure and otherwise supporting health, law and order and education in the community. Our FY21 Sustainability Report sets out our recent community initiatives.

We are proud of the role we have played and continue to play in improving the living standards of the residents on Simberi Island.

### Our supply chains

The section sets out the risks of modern slavery in our supply chain and the due diligence we have undertaken to assess and address those risks.

We continue to recognise that every supply chain carries the risk of causing, contributing or being directly linked to modern slavery. Given our industry sector, we are cognisant that the risks are inherently higher, particularly in PNG where the Global Slavery Index estimates that 81,000 people live in modern slavery. Having regard to the heightened risks we have, we continue to evaluate our supply chain for modern slavery impacts.

In the first reporting year (FY20), we reviewed our procurement spend across each of our operations and prepared a list of direct tier 1 suppliers based on an annualised spend of A\$25,000+. In FY21 we lowered the direct tier 1 supplier annualised spend threshold to A\$20,000 (**Due Diligence List**). This Due Diligence List comprising approximately 660 suppliers became our focal point for our supply chain review for modern slavery risk in FY21.

The UN's Guiding Principles on Business and Human Rights (**Guiding Principles**) articulates best practice in respect of human rights due diligence (which encompasses modern slavery). It includes four stages:

- Impact assessment
- Integration
- Tracking
- Communication

The UN's Guiding Principles recognises that prioritisation of risk is often essential for companies with extensive supply chains. We maintained the view that an online questionnaire-based approach was the most appropriate means by which to undertake our impact assessment. This would, in turn, determine our supply chain priorities in responding to modern slavery risk in our supply chains.

The suppliers on the Due Diligence List were issued a modern slavery questionnaire (**MSQ**) which was sent out via a third-party SAP cloud-based platform. The MSQ was designed with five key risk areas in mind:

- Jurisdiction/country of origin risk
- Industry/product risk
- Utilisation of vulnerable workers
- Prior human rights impact assessment
- Implementation of policies, procedures and systems

The MSQ features automated analytics that generates a modern slavery risk rating for each supplier based on responses to the weighted questions. The datasets underpinning the analytics are driven by global indices on modern slavery and human rights risks.

As part of the MSQ communications with our suppliers, in FY21 we also provided a link to our FY20 Modern Slavery Statement. This was one of our FY21 KPIs set out in the FY20 Modern Slavery Statement. The intent behind this KPI was to provide further context to our suppliers with respect to the importance we place on identifying and addressing modern slavery risks in our supply chains.

We had a lower supplier completion rate of the MSQ in FY21 as compared to FY20. The completion rate was likely impacted by the absence of modern slavery legislation in Canada and PNG, the lack of familiarity/awareness amongst our suppliers of the concept of 'modern slavery' and the impact of COVID-19. We are reviewing how we can improve completion rates going forward.

Almost 60% of the suppliers who responded to the questionnaire received a low risk rating. The bulk of the suppliers in the low risk category were in the professional, scientific and technical services industry in low risk jurisdictions such as Australia and Canada, both of which have lower modern slavery risk profiles. This result was as anticipated. A sizeable proportion of suppliers operating in the mining or related industries (typically higher risk sectors) in Australia also came in as overall low risk largely attributable to the presence of extensive policies and processes in place within those companies to mitigate modern slavery risks.

We took a closer look at the suppliers who were given a risk rating of medium and high based on the combination of jurisdiction and industry risks. The suppliers in the medium risk category were predominately in the mining, manufacturing and construction industries with some suppliers operating in higher risk jurisdictions. The combination of higher risk industries and jurisdiction were some of the main factors driving up the risk profile to medium. These risks were not automatically categorised as high risk due to suppliers having policies and processes in place to mitigate the risks.

In fulfilling our commitment made in our FY20 Modern Slavery Statement to commence a deep dive into the supply chain of our suppliers in the construction sector in PNG, five high-risk suppliers were contacted directly with the view of better understanding their supply chain beyond tier 1. The outcome of this deep dive exercise has resulted in three of these high-risk suppliers initiating the preparation of their own supply chain map to better understand any modern slavery risks. The remaining two suppliers were interviewed face-to-face and supplied with the company's Supplier Code of Conduct statement and brochures outlining St Barbara's Modern Slavery Policy.

## Risks of modern slavery *continued*

During FY21 we identified three suppliers in the higher risk category as part of the MSQ process.

One supplier to Leonora Operations is in the equipment hire/purchase services sector. The supplier had limited policies and controls in place to address modern slavery risks, operates in a modern slavery high risk industry, as well as importing goods made in higher risk jurisdictions of modern slavery.

The remaining two suppliers were from PNG; one of which is from the engineering/industrial services sector, while the other provides landscaping services. The landscaping supplier was rated as a higher risk as a result of having a high industry and jurisdiction risk, as well as employing indigenous workers with no controls and policies in place to address human rights considerations.

We reviewed the landscaping services being provided at our Simberi operations, where a number of worker rights issues were found, as summarised below:

- Expecting workers to regularly perform additional hours/days of unpaid work.
- Providing inadequate machinery for workers to do their jobs.
- Not providing lunches.

In our assessment, we have not caused or contributed to the human rights impact in these instances, but rather, consider there to have been a risk of being directly linked by virtue of the conduct of our suppliers. In recognition of our responsibilities as set out in the UNGPs, we directed those suppliers to implement corrective actions on the basis that unsatisfactory implementation would result in St Barbara going to tender for alternative suppliers. We have also provided lunches to personnel of suppliers where necessary.

Our supply chain involves transportation and shipping of goods supplied to our sites and gold from the mine site to refineries. Depending on the nature of the goods supplied, either the supplier or we take responsibility for the shipping or freight. The transportation of gold from our mine operations is organised by third party refineries. We are cognisant that there have been reports of increased risks of modern slavery in shipping and freight exacerbated by the COVID-19 pandemic. For example, seafarers working in the international shipping industry are said to have worked under poor living and working conditions, unable to leave the ship and return home for extended periods of time.



Leonora processing plant.

## Actions to assess and address risks

Building on the initiatives undertaken in FY20, we undertook a number of key initiatives this reporting period to identify, assess and address modern slavery risk in our global operations and supply chains. These included:

1. Developing and implementing a Modern Slavery Procedure
2. Establishing a Modern Slavery Working Group
3. Facilitating an operations modern slavery and risk workshop
4. Providing modern slavery training for the majority of our people
5. Developing a communications plan and supporting materials
6. Undertaking modern slavery due diligence of our suppliers and investment targets

### Modern Slavery Procedure

We are committed to maintaining high standards of ethics, integrity and statutory compliance. Modern slavery is one of our focus areas and our Modern Slavery Policy outlines our commitment to eliminating modern slavery within our global operations and supply chains. The Modern Slavery Procedure supplements the Modern Slavery Policy by outlining the processes in place to assist the St Barbara Group in identifying and addressing modern slavery in its global operations and supply chains.

### Modern Slavery Working Group

A Modern Slavery Working Group was established in FY21. The Modern Slavery Working Group consists of members from the procurement, human resources, community, legal and risk functions of the St Barbara Group. The purpose of the St Barbara Modern Slavery Working Group is to:

- Oversee the St Barbara group of companies' compliance with the Modern Slavery Policy and relevant modern slavery laws.
- Support an integrated approach to addressing modern slavery risk.
- Develop the content for the modern slavery annual statement.
- Support the review and publication of the modern slavery annual statement.
- Implement the commitments and actions arising from the modern slavery annual statement.
- Monitor the Company's modern slavery performance.
- Inform and advise the Executive on modern slavery related matters and emerging issues.

### Operations Modern Slavery Risk Workshop

To support the assessment of modern slavery operational risks, in FY21 the Operations Team held a workshop to support the following objectives:

- Deepen our understanding of modern slavery.
- Identify the relevant modern slavery risks at St Barbara.

- Assess modern slavery risks in the mining sector.
- Consider our own modern slavery risks.
- Plan our approach to remediation if a modern slavery risk is identified.
- Set Operations Team priorities for FY21.

### Communications plan and materials

A communications plan was developed to raise awareness of modern slavery within the workforce on the island in PNG. The plan identified stakeholders and mechanisms for engagement. A fact sheet was developed for operations and translated into the local language to support communications efforts on Simberi.

### Education and training

We have a strong focus in educating and training our personnel. In FY20 modern slavery focused training was provided to all procurement and human resources personnel, across all sites, as well as to all St Barbara managers (across all functions) and the St Barbara executive leadership team. We delivered on a key FY20 commitment, with the provision of modern slavery training to the majority of our people, across all sites via an eLearning module that covered topics such as:

- An overview of modern slavery.
- Our reporting obligations under the Modern Slavery Act.
- Types of modern slavery risk, including types of risks of modern slavery practices.
- The steps we are taking to identify and assess modern slavery risk in our operations and supply chains.
- How to report a known or suspected modern slavery risk, including within our grievous resolution framework.

At the conclusion of the eLearning module, a number of multiple-choice questions were asked of the person receiving the training.

### Case study

During FY21, from 22 May production ceased at Simberi Operations for a period of time that extended beyond the end of the financial year. While all employees continued to receive their full remuneration, the volume of some contract work was impacted. Royalty payments, which are revenue based, also ceased (noting that local contractors are often also royalty recipients). This may have placed a number of workers employed by contractors at risk if their employers did not pay workers for the work performed. In recognition of the worker rights at stake, lines of credit were extended where requested. Mining and production is expected to resume in Q2 FY22, by the end of calendar year 2021.

**Actions to assess and address risks** *continued*

**Other Initiatives**

In addition to the initiatives implemented in FY21, the following sets out further initiatives implemented to assist in identifying and addressing modern slavery risks in our operations and supply chains.

**(a) Grievance process**

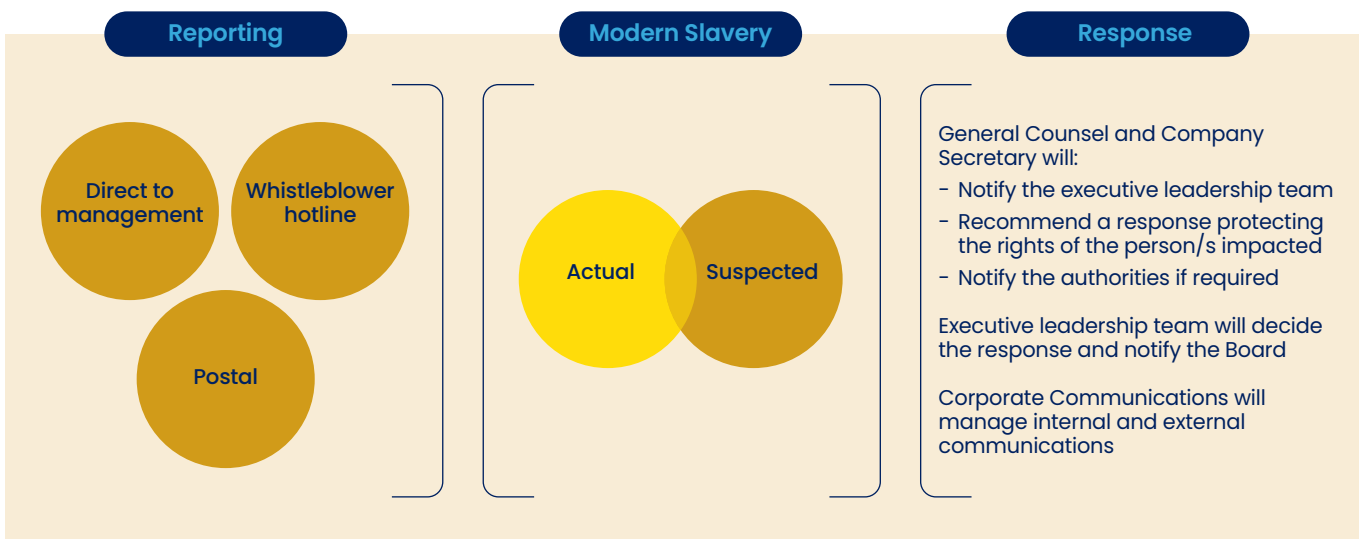
We are committed to providing, or cooperating in, remediation where we have identified that we – or our suppliers – have caused or contributed to modern slavery. In relation to our suppliers, remediation may include actions such as supplementary training, contract suspension, contract cessation and/or reporting to authorities.

If, hypothetically, we found that our business had caused or contributed to someone working for us as a modern slave, we would take guidance from the UNGPs, which

provides that businesses in this situation need to remediate the impact by taking a person-centred approach protecting the safety, privacy and wellbeing of the affected person. We would undertake a full investigation of the situation to ensure that an appropriate corrective action plan is implemented and assess how similar impacts could be avoided in the future.

The steps we take to help ensure grievance mechanisms are trusted and accessible by including the details in corporate and local language fact sheets made available at operations. Refer to the communications plan and materials.

Below is a high-level flow chart indicating the process the entity would undertake in the event we identified an instance of modern slavery in our operations or supply chains.



**(b) Audits**

St Barbara conducts regular audits across a number of areas including finance, payroll, human resources, health, safety, and environment and community. Some of our audits are conducted by third parties. Management at our mine sites do 'walk-arounds'.

COVID-19 restricted our ability to conduct the Gender Safety Audit with Papua New Guinea's Business Coalition for Women. Until this point, these audits have been regularly conducted at our Simberi operations since 2016.

They are a valuable tool in creating a safe and inclusive workplace for our people and are planned to occur at all operations during FY22.

St Barbara also conducts regular gender pay audits and has a nil gender pay gap for like-for-like roles. Our target to reduce 'overall gender pay gap' to 8% by 2022 was met in 2021. We have been able to achieve this objective by increasing the number of women in senior leadership roles across the Group.



## Actions to assess and address risks *continued*

### (c) Modern Slavery Policy

Developed in FY20, the Modern Slavery Policy outlines our commitment to eliminate modern slavery within our global operations and supply chains. These commitments include:

In relation to St Barbara's operations:	In relation to St Barbara's supply chain:
<ul style="list-style-type: none"> <li>• Ensure that all of St Barbara's employees work for St Barbara voluntarily and are able to provide evidence that they are older than the minimum working age in the jurisdiction in which they work</li> </ul>	<ul style="list-style-type: none"> <li>• Wherever possible, require St Barbara's suppliers to agree to comply with the St Barbara Supplier Code of Conduct and the Modern Slavery Policy and otherwise seek to engage suppliers who uphold St Barbara's commitment to eliminating modern slavery practices</li> </ul>
<ul style="list-style-type: none"> <li>• Ensure that all of our employees are paid no less than the minimum wage in the jurisdiction in which they work</li> </ul>	<ul style="list-style-type: none"> <li>• Undertake regular due diligence on St Barbara's supply chain to identify and address any actual or potential risks of modern slavery</li> </ul>
<ul style="list-style-type: none"> <li>• Educate St Barbara personnel in relation to how to identify indicators of modern slavery</li> </ul>	<ul style="list-style-type: none"> <li>• Work with St Barbara's suppliers to assist them to identify and manage the risk of modern slavery within their operations and supply chain</li> </ul>
<ul style="list-style-type: none"> <li>• Annually assess St Barbara's operations for modern slavery risk</li> </ul>	<ul style="list-style-type: none"> <li>• Make the St Barbara Whistleblower program available to St Barbara's suppliers</li> </ul>

The Modern Slavery Policy supplements St Barbara's Code of Conduct and Supplier Code of Conduct, and is publicly available on our website at [stbarbara.com.au/about-us/governance/](http://stbarbara.com.au/about-us/governance/)

The Modern Slavery Policy forms part of our integrated suite of governance policies that together form our Code of Conduct.

### (d) Supplier Code of Conduct

Developed in FY20, the Supplier Code of Conduct sets out our business principles, based on Our values. These business principles relate to:

- Modern slavery
- Anti-bribery and corruption
- Diversity and inclusion
- Health and safety
- Sustainability

We are committed to engaging with only those suppliers whose principles match our own. Our suppliers are required to comply with all applicable laws and, in all cases, to meet the standards and principles set out in our Supplier Code of Conduct across all areas of their business.

The Supplier Code of Conduct requires our suppliers to comply with applicable modern slavery laws and expressly prohibits any forms of human trafficking, slavery, servitude, forced labour, forced marriage, deceptive recruiting for labour and services, debt bondage and child labour. We clearly state in our Supplier Code of Conduct that we reserve our right to undertake due diligence and risk assessments to verify supplier compliance. These verification rights are supported by our standard contract terms and conditions.

We expect all of our suppliers to comply with the Supplier Code of Conduct. The Supplier Code of Conduct is publicly available on our website at [stbarbara.com.au/contact/suppliers/](http://stbarbara.com.au/contact/suppliers/)

### (e) Our policies and procedures

We updated a number of our policies and procedures in FY20 after undertaking a modern slavery gap analysis. This included updates to our Procurement Policy, Whistleblower Policy and Human Resources recruitment guidelines.

The Whistleblower Policy forms part of our Grievance Resolution Framework. The Whistleblower Policy provides a mechanism whereby St Barbara employees, suppliers and others can report their concerns of actual or suspected misconduct, including modern slavery related breaches without the fear of reprisal or intimidation. All of our employees, contractors, consultants and suppliers have access to St Barbara's whistleblower system. Our whistleblower reporting service is managed by an external independent provider, where reports may be submitted by phone, on-line or by mail. In addition to this service, our employees may also report to their manager or designated Whistleblower Protection Officer.

No complaints related to modern slavery were reported via our whistleblower system in FY21.

Further information regarding the whistleblower and investigation process is set out in the Whistleblower Policy, publicly available on our website at [stbarbara.com.au/our-company/governance/](http://stbarbara.com.au/our-company/governance/)

## Actions to assess and address risks *continued*

### (f) Engaging suppliers via on-boarding

We understand the importance of early detection of modern slavery risk in our supply chains. Consequently, as part of the supplier onboarding process, we have sought to undertake a modern slavery risk assessment for all new suppliers to our business with an annualised spend of greater than A\$20,000 (in FY20 this was A\$25,000).

In addition, we updated our procurement tender process in FY20 by introducing modern slavery related considerations in our tender assessment criteria.

It is our policy not to engage with third parties where the minimum national and/or international legally required labour standards are not adhered to or where we believe, following a modern slavery risk assessment, that the third party or its suppliers engage in modern slavery (**Minimum Standards**). We will not enter into or renew any contract with a third party whose risk of modern slavery is assessed as high without evidence that the third party has in place adequate controls to manage the risk of modern slavery.

More broadly, where the Minimum Standards have otherwise not been met, we will work with the supplier to help achieve, at the very least, the Minimum Standards prior to entering into any contractual arrangement. If the Minimum Standards are not met within a reasonable period, it is our policy to not engage with the supplier or terminate the existing engagement, as relevant, regardless of any short-term disruption to the supply chain.

### (g) Engaging suppliers – contracting

Where possible, we engage suppliers under our standard terms and conditions. These terms and conditions require our suppliers to meet a number of minimum standards, including with respect to:

- Workplace behaviour.
- Health and safety.
- Environment.
- Anti-bribery and anti-corruption.
- Modern slavery.

We expect our suppliers to meet these minimum standards. Where possible, we will endeavour to address modern slavery in all supplier engagements.

In FY21, the majority of the supply contracts entered into by the Group contained provisions addressing modern slavery obligations on the supplier.

### (h) Review of St Barbara's joint ventures

We recognise that modern slavery may exist in the joint ventures we are associated with. Where we operate and manage a joint venture, we monitor and report on any modern slavery risk in that joint venture operation as part of St Barbara's operation. This is the approach taken with the Lake Wells Joint Venture.

Where we do not operate and manage the joint venture, we will assess modern slavery risk at a broader level. This includes annually requesting, from the operator, the processes and procedures the joint venture has in place to address modern slavery risk in its operations and supply chains. If we become aware of any material modern slavery risk in the joint venture, we will endeavour to address this risk with the joint venture operator. We have adopted this approach with the Drummartin Joint Venture and will do the same with the North Pinjin Joint Venture.

As a minority shareholder of Catalyst Metals Ltd, St Barbara made a request for information with respect to all of Catalyst's operations, which includes the Drummartin Joint Venture. Catalyst's response supports our opinion that there is a low risk of modern slavery practices associated with Catalysts' operations, including the Drummartin Joint Venture.

We will continue to engage in dialogue with Catalyst and our joint venture partners and seek ways to work collaboratively to increase awareness of modern slavery risks in the extractives industry.

### (i) Review of St Barbara's equity investments

We recognise that modern slavery may exist in the companies in which we invest. We have introduced modern slavery considerations as part of our due diligence process when assessing any investment opportunity.

Where we have invested in a company that we do not control, we will continue to assess modern slavery risk at a broader level. This includes an annual request from the company regarding that company's processes and procedures in place to address modern slavery risk in its operations and supply chains. If we become aware of any material modern slavery risk in the company, we will endeavour to address such risk with the company. This is the approach St Barbara has taken with its investments in Catalyst Metals Limited, Duketon Mining Limited and Peel Mining Limited.

# Measuring effectiveness

The evaluation of effectiveness is vital to ensuring that we are on the right track and effecting meaningful change.

We are committed to continually developing and improving the effectiveness of the actions we are taking to assess and address modern slavery risks.

One example is our monitoring of the modern slavery risk profile of our suppliers via the online automated MSQ process. The functionality of the MSQ process allows us to track our supplier’s modern slavery risk profile each time it responds to the MSQ. Over time, this process will assist us in determining whether any actions we are taking with “higher risk” suppliers is effective in reducing such risk.

Another example of measuring effectiveness is in relation to our modern slavery training, including the eLearning module and embedded quiz. We are tracking completion rates and quiz accuracy by operation.

### Performance against FY21 action status

The table below outlines the status of actions for FY21, associated status and where they are addressed in the Statement.

FY21 Actions (as set out in the FY20 Modern Slavery Statement)	Report Status
Aim to improve the due diligence completion rate of the FY21 MSQ responses to at least 60%	Ongoing (refer to page 11)
Endeavour to share our Modern Slavery Statement with a cover note in the lead up to the issuing of MSQs for our second year of supply chain due diligence as a way of communicating the importance we place on addressing modern slavery risks in our business and supply chain	Completed (refer to page 11)
Commence a deep dive in relation to the supply chain of construction in PNG with a view to increasing our understanding beyond tier 1 and making an informed decision in relation to our suppliers for the provision of construction in PNG	Completed (refer to page 11)
Endeavour to roll out modern slavery training to the majority of our people, across all sites, through e-learning training	Developed and rolled out (refer to page 13)
Work closely with the Community Relations Office at the Simberi operations to create a communication plan to raise awareness of modern slavery within the workforce on the island	Plan created, fact sheet developed and implementation ongoing (refer to page 13)
Commence the MSQ process with the contracting companies who source workers for St Barbara on Simberi Island	Completed including face to face interviews (refer to page 12)

The following table highlights our commitment to continuous improvement, actions and measures for FY22.

FY22 Actions	Measure
1. Conduct targeted Modern Slavery working group sessions for relevant employees and contract owners	At least three working group sessions
2. Engage and collaborate with external networks to support education on modern slavery, enhance knowledge sharing and emerging practice	At least two knowledge sharing sessions
3. Engage local Simberi stakeholder groups providing awareness on modern slavery and grievances processes	Engagement with at least four local stakeholders/groups
4. Continue to improve the due diligence completion rate of the FY22 MSQ responses	Percentage improvement on previous year
5. Interrogate the supply chain of engineering/industrial supply and landscape labour sectors into PNG and equipment hire/purchase sector into Leonora	Due diligence on at least three high-risk suppliers
6. Conduct a risk assessment on modern slavery risks in relation to chartered shipping supply chain	Risk assessment on chartered shipping supply chain

## Consultation with the Group

In FY21 we strengthened our consultation process by establishing a Modern Slavery Working Group.

The Modern Slavery Working Group consists of members of the procurement, human resources, community, legal and risk functions of the St Barbara Group. The Modern Slavery Working Group meets on a regular basis to oversee St Barbara Groups' compliance with the Modern Slavery Policy and relevant modern slavery laws. The Modern Slavery Working Group informs and advises the Executive on Modern Slavery related matters and emerging issues.

The St Barbara Board is responsible for the oversight of all sustainability issues in the St Barbara Group, with the Board's Audit and Risk Committee responsible for ensuring the proper management of human rights-related risks, including modern slavery.

St Barbara has a centralised management function as follows:

- The procurement function of all locations ultimately report to St Barbara's Head of Finance and Procurement.
- The human resources function for all locations reports to St Barbara's Head of People, Communications & Corporate Affairs.
- The majority of policies and procedures (including the Modern Slavery Policy and Procurement Policy) are applicable to all of our operations.
- Contract templates have been updated to include modern slavery clauses for all of our operations.
- Modern slavery eLearning module developed and provided for the majority of our personnel for all of our operations.

The Health, Safety, Environment and Community Committee has responsibility in ensuring modern slavery practices are identified and addressed in our operations.

The MSQ process was a joint effort across our locations in FY21, with site General Manager support. The procurement team worked collaboratively to formulate the Due Diligence List comprising suppliers from Australia, Canada and PNG. Significant support was provided by our Papua New Guinea operations in conducting face-to-face interviews with local suppliers who were not able to access the computer based MSQ process. These suppliers were also provided St Barbara's Supplier Code of Conduct statement and Modern Slavery Policy in an educational brochure format.

Preparation of this Statement has involved consultation and input from all of the operating companies within the St Barbara Group, including procurement, human resources, community and legal and the Modern Slavery Working Group. The St Barbara Executive Leadership Team also reviewed this Statement before being submitted for Board approval.



Touquoy pit.

# Other information

## External engagement

St Barbara undertook external engagement with industry and not-for-profit organisations to share learnings and network with peers. This engagement included:







- Anti-Slavery task force – Networking meeting with Anti-Slavery task force to identify potential local partners.
- Minerals Council of Australia – Presenting in an industry webinar through the MCA to share learnings from our first year of Modern Slavery reporting with industry peers.
- Other non-mining organisations – Participating in industry webinars to remain aware of best practices and learnings from other industries.

- PNG HR network – Collaborating and engaging with industry representatives to canvas potential actions for age verification of our Simberi workforce.

In addition, community engagement is an important part of each of our operations and activities undertaken is outlined in our 2021 Sustainability Report <https://stbarbara.com.au/wp-content/uploads/2021/09/2021.09.17-asx-2021-sustainability-report.pdf>.

## United Nations Sustainable Development Goals (UNSDGs)

As part of our membership of the UN Global Compact, we support the UNSDGs. We have mapped our impacts against the most relevant goals:

UNSDG (only most relevant goals)	Contribution	Self-assessment of impact
 <b>1 NO POVERTY</b>	<p><b>No poverty</b></p> <p>We contribute through the employment of people at high relative wages in:</p> <ul style="list-style-type: none"> <li>• a developing country, PNG</li> <li>• a rural location in Nova Scotia, Canada, with relatively low employment rates, wages, and opportunities.</li> </ul> <p>We pay our taxes, contribute to charities and, in PNG and Canada, engage local businesses.</p>	High
 <b>2 ZERO HUNGER</b>	<p><b>Zero hunger</b></p> <p>We provide financial and administrative support for the establishment of local enterprises, including for farmers near Simberi Operations, who sell food, other goods, and services to our mines and into the local economy. These revenues for local suppliers, as well as the wages earned by local employees, contribute to income streams that help combat food insecurity. We have also supported food banks in Nova Scotia and Western Australia.</p>	High
 <b>3 GOOD HEALTH AND WELL-BEING</b>	<p><b>Good health and wellbeing</b></p> <p>We aim for zero harm to our employees and strive for improvement in our safety metrics year-on-year. We fund and run programs that support good health and wellbeing among employees and the community at our operations. In PNG, we provide free vaccinations to the community at our clinic, and where necessary roll out emergency vaccination programs. We also fund anti-malaria non-governmental organisations (NGOs) in PNG.</p> <p>In Australia and Canada, we provide free flu vaccinations.</p> <p>In all three countries, we offer free mental health support to all employees, with special measures taken during the COVID-19 pandemic.</p>	Medium
 <b>4 QUALITY EDUCATION</b>	<p><b>Quality education</b></p> <p>In PNG, we support primary schools in the community and adult education for our employees and employees of contractors. This has included building houses for teachers, and donations of stationary, books and desks.</p> <p>In Western Australia, we provide multi-year support to development and sports foundations that help Indigenous children in remote locations to attend school and achieve their goals.</p>	Medium
 <b>5 GENDER EQUALITY</b>	<p><b>Gender equality</b></p> <p>We are a global mining industry leader for gender equality, winning numerous awards for promoting and achieving high levels of women's employment, gender safety at work, domestic violence prevention and strong post parental leave return-to-work initiatives.</p>	High
 <b>6 CLEAN WATER AND SANITATION</b>	<p><b>Clean water and sanitation</b></p> <p>None of our mines is in competition with domestic and agriculture water users.</p> <p>All three mines utilise recycling to minimise water use and costs.</p> <p>Our Leonora Operations Gwalia mine in Western Australia has received government 'Waterwise' awards for reductions in water use in 2012, 2013 and 2020.</p>	Medium

Other information continued

UNSDG (only most relevant goals)	Contribution	Self-assessment of impact
 <p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p>	<p><b>Decent work and economic growth</b></p> <p>We strive to employ locally at our sites. At Simberi and Atlantic Operations, large proportions of our employees are from the immediate local area, or the region. We also contribute to economic growth by aiming to use and support local and regional businesses and suppliers (in PNG we frequently purchase from local landowner-owned businesses).</p> <p>We have kept our mines fully operational and workforce employed during the COVID-19 pandemic, and have growth projects at all three mines in the construction, planning or permitting stages. All employees and contractors are treated with respect and protected by a range of workplace policies. Our Papua New Guinea and Canada mines provide jobs at above average wages in those regions.</p>	<p>High</p>
 <p><b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>	<p><b>Industry, innovation and infrastructure</b></p> <p>At Leonora Operations in Western Australia, we have pioneered new developments in underground mining.</p> <p>At Simberi in PNG, we build and maintain roads, water, education, and health infrastructure for our local communities.</p> <p>At Atlantic, Canada, we are trialling scalable salt-water batteries that will be the basis of our drive for carbon neutrality.</p>	<p>Medium</p>
 <p><b>13</b> CLIMATE ACTION</p>	<p><b>Climate action</b></p> <p>We have a history of striving for relatively high GHG efficiency per ounce of gold produced. Last year we announced long-term targets to 2030 and 2050 to improve this efficiency further in line with Paris 2015 goals to achieve carbon neutrality by 2050.</p>	<p>Medium</p>
 <p><b>15</b> LIFE ON LAND</p>	<p><b>Life on land</b></p> <p>We undertake rehabilitation of disturbed land and management of waste and effluent according to regulatory requirements as well as provide offsets for unavoidable land and water harm to a higher standard of biodiversity.</p> <p>We prepare for closure in accordance with strict government requirements for forward financial provisioning.</p>	<p>Low</p>
 <p><b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS</p>	<p><b>Peace, justice and strong institutions</b></p> <p>We have been a financial supporter of the EITI for five years and publish government taxation related information in our Sustainability Report.</p> <p>All political donations are prohibited under our governance policies.</p> <p>We published our first modern slavery policy and statement in alignment to our human rights commitments (within our 'Community Relations' policy) this year, and have a comprehensive supply chain code of conduct and updated procedures.</p>	<p>Medium</p>

## 2021 Sustainability Report

Our annual Sustainability Report details our Environmental, Social and Governance commitments and activities from FY21. We have extracted the information relevant to our Modern Slavery Statement below. The Sustainability Report is publicly available on our website at <https://stbarbara.com.au/sustainability/>

St Barbara uses the Global Reporting Initiative (GRI) standards to guide our sustainability disclosures. An extract of relevant GRIs from our 2021 Sustainability Report is shown below and alignment with the UN Global Compact (UNGC) principles:

GRI Ref <sup>1</sup>	GRI Core met <sup>2</sup>	Item	Discussion	UNGC <sup>3</sup>
408	-	Child Labour	Children are forbidden from entering (as well as working in) the Group's operations. The Group holds that this area is immaterial because the assessed risk of incidence is low.	5
409	-	Forced or Compulsory Labour	The Group holds that this area is low risk, as the assessed risk of related issues is low.	4
410	-	Security Practices	The Group holds that this area is low risk, as the assessed risk of related issues is low.	2
411	-	Rights of Indigenous Peoples	The Group has extensive procedures in place to ensure the rights of Indigenous peoples are not violated and has had no significant incidents during the reporting period.	2
		Mining and Metals supplement	MM5 Operations adjacent to indigenous people's territories. This area is considered immaterial for the same reasons as stated in 411 above. In Canada and PNG, the Group has formal agreements with Indigenous groups	2
412	-	Human Rights Assessment	The long-term history of democratic liberal constitutional government in Australia, Papua New Guinea and Canada make these important issues of low materiality to the Group, in the sense that the assessed risk of related issues is low.	1, 2
		Mining and Metals supplement	The Human Rights areas in the Mining and Metals supplement G4 DMA and MM5 are excluded also for the same reasons.	1, 2
413	-	Local Communities	In Leonora, Western Australia (WA), the township is too small to meet the labour and supply demands of the operation. The labour needs of the operation are largely met via a 'fly-in, fly-out' workforce and suppliers based mostly in Western Australia. In Papua New Guinea mining regulation mandates a high level of involvement. As a result, 1-2% of total costs of the Simberi mine are related to Community support functions, ~45% of the workforce lives locally, and 6% of total costs are spent with local suppliers and contractors. The Group reports on its employment of local community members, its contracting with local community companies and its grievance/complaint function in this report.  In Touquoy, Canada, nearly all employees live locally. As a newly acquired operation the Company is reviewing all procurement arrangements with engagement of local businesses an important consideration.	1, 2, 3, 6
		Mining and Metals supplement - G4DMA	'Impact on local communities' in the Mining and Metals supplement G4DMA is excluded as a heading, but is disclosed under 'Waste'. Benefits to the community in terms of initiatives is disclosed.	7, 8, 9
		Mining and Metals supplement - MM8	Artisanal and Small-scale Mining: the Group has no mine sites that feature artisanal mining. The Leonora Western Australia mine is underground. The gold in Simberi ore can typically only be liberated by modern processing methods.	1, 2
		Mining and Metals supplement - MM9	Resettlements - the Group has no mine sites with significant resettlements.	1, 2

1. GRI disclosure standard, [www.globalreporting.org](http://www.globalreporting.org)

2. Disclosure required to comply with GRI Standards core reporting option, [www.globalreporting.org](http://www.globalreporting.org)

3. UN Global Compact Principle

### UN Global Compact

St Barbara is a signatory and member of the UN Global Compact. Below we describe our integration of Global Compact principles into our business strategy, culture, and daily operations.

Topic	Accounting metric	Alignment with Sustainability Report FY21 reference
Security, Human Rights and Rights of Indigenous Peoples	Percentage of (1) proved and (2) probable reserves in or near areas of conflict	1. 0% 2. 0%
	Percentage of (1) proved and (2) probable reserves in or near indigenous land	1. 100% – as per SASB definitions 2. 100% – as per SASB definitions
	Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	Page 43
Community Relations	Discussion of process to manage risks and opportunities associated with community rights and interests	Various in community section, starting page 33
	Number and duration of non-technical delays	None. Pages 33-42
Labour Relations	Percentage of active workforce covered under collective bargaining agreements, broken down by U.S. and foreign employees	<1%. In Australia, approximately 1%, Papua New Guinea 0%, Canada 0%.
	Number and duration of strikes and lockouts	None
Workforce Health and Safety	(1) MSHA all-incidence rate, (2) fatality rate, (3) near miss frequency rate (NMFR) and (4) average hours of health, safety, and emergency response training for (a) full-time employees and (b) contract employees	All incidence rate = $20 \times 200,000 / \text{hours worked (5 million)} = 0.78$ Fatality rate = $1 \times 200,000 / \text{hours worked (5 million)} = 0.04$ NMFR – not recorded Average hours of emergency training – not calculated



### Sustainability Accounting Standards Board (SASB)

St Barbara reports our alignment with the Sustainability Accounting Standards Board (SASB) Metals and Mining Standard. Below is an excerpt of relevant topics from this years disclosure.

Issue Area	Global Compact Principle	Implementation and measurement
<b>Human Rights</b>	<p><b>Principle 1 –</b> Businesses should support and respect the protection of internationally proclaimed human rights</p> <p><b>Principle 2 –</b> Businesses should make sure that they are not complicit in human rights abuses</p>	<p>Company policies and charters, especially:</p> <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Community Relations Policy</li> <li>• Health and Safety Policy</li> <li>• Modern Slavery Policy</li> <li>• Modern Slavery Statement 2020</li> <li>• 2021 Sustainability Report, 'Safety Always', 'Stronger Communities' sections and related data table components</li> </ul>
<b>Labour</b>	<p><b>Principle 3 –</b> Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining</p> <p><b>Principle 4 –</b> Businesses should uphold the elimination of all forms of forced and compulsory labour</p> <p><b>Principle 5 –</b> Businesses should uphold the effective abolition of child labour</p> <p><b>Principle 6 –</b> Businesses should uphold the elimination of discrimination in respect of employment and occupation</p>	<p>Company policies and charters, especially:</p> <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Diversity and Inclusion Policy</li> <li>• Equal Opportunity Policy</li> <li>• Health and Safety Policy</li> <li>• Modern Slavery Policy</li> <li>• Modern Slavery Statement 2020</li> <li>• Workplace Behaviour Policy</li> <li>• Supply chain code of conduct</li> <li>• 2021 Sustainability Report, 'Empowered People, Diverse Teams' and related data table components</li> </ul>
<b>Environmental</b>	<p><b>Principle 7 –</b> Businesses should support a precautionary approach to environmental challenges</p> <p><b>Principle 8 –</b> Businesses should undertake initiatives to promote greater environmental responsibility</p> <p><b>Principle 9 –</b> Businesses should encourage the development and diffusion of environmentally friendly technologies</p>	<p>Company policies and charters, especially:</p> <ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• 2021 Sustainability Report, 'Respecting the Environment' section (sub-sections, 'Waste', 'Climate Change' and 'Water')</li> </ul>
<b>Anti-Corruption</b>	<p><b>Principle 10 –</b> Businesses should work against corruption in all its forms, including extortion and bribery</p>	<p>Company policies and charters, especially:</p> <ul style="list-style-type: none"> <li>• Anti-Bribery and Anti-Corruption Policy</li> <li>• Audit and Risk committee charter</li> <li>• Code of Conduct</li> <li>• Conflict of Interest and Related Parties Policy</li> <li>• Donations, Sponsorships, Community Programs Policy</li> <li>• Modern Slavery Policy</li> <li>• Whistleblower Policy</li> <li>• Supply chain code of conduct</li> <li>• 2021 Sustainability Report in the 'Our approach to sustainability' section and related 'Performance data table</li> </ul>

Statement Annexure

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	3-6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9-12
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	13-16
e) Describe how the reporting entity assesses the effectiveness of these actions.	17
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	18
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	19-24

